

October 15, 2014

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities, CG Docket 03-123

Dear Ms. Dortch:

We represent Purple Communications, Inc. ("Purple" or the "Company"). In an email to the Company dated September 15, 2014, followed by a letter dated October 2, 2014, the TRS Fund Administrator (the "Administrator") notified Purple that it had received direction from the Commission to suspend reimbursements to Purple for its provision of IP Relay services rendered in July 2014. The October 2, 2014 letter attempts to justify the Commission's decision to withhold for as long as a year, and/or ultimately deny, Purple's reimbursement for services rendered in July 2014 based on the content of certain calls by self-certified, registered and verified users and observed by Commission staff during a July 2014 site visit. The October 2, 2104 letter also instructs Purple to monitor, evaluate, record and produce call content to the Administrator, an agent of the Commission. Further, the October 2, 2014 letter provides that reimbursement is contingent upon the Company providing the Administrator, an agent of the Commission, with records of call content, and appears to suggest that the Company should have limited the access of self-certified deaf and hard of hearing, registered and verified users to its service based on the content of their communications.

Based on this most recent action by the Commission, the findings and requests in the October 2, 2014 letter, and a series of related events and Commission decisions, we write to inform the Commission that Purple will no longer provide IP Relay TRS services as of 5:00PM (EST) on November 14, 2014 and will immediately cease enrolling new IP Relay customers. Purple is also immediately informing all of its IP Relay customers of its decision to exit the IP Relay service so that customers can begin the process of moving their accounts to the last remaining IP Relay service provider, should they elect to continue to use the service. To minimize the impact to consumers, Purple will also continue to provide its customers with assistance in porting numbers through November 14, 2014.

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Purple is disappointed that it must take this action. However, the Commission's (i) directive to withhold payments based upon misperceptions about the efficacy of its own registration and verification rules; (ii) changing, unpredictable and contradictory interpretations, implementations and enforcement of applicable rules; and (iii) indifference to business realities, has created an untenable level of uncertainty for Purple. The Company has concluded that if it continues to incur operational costs in compliance with the Commission's current call handling and functional equivalency mandates, it does not have a reasonable basis to expect reimbursement of its costs in a commercially reasonable time and manner, if at all. Purple, like Hamilton, AT&T and Sorenson, has concluded that it cannot operate an IP Relay service under the current state of the Commission's approach to the industry and the applicable rules.

Nonetheless, in the event the Commission can establish clear expectations for the industry, upon which the Company can reasonably rely, Purple would be pleased to consider resuming its IP Relay services.

This announcement does not affect Purple's Video Relay Service and IP Captioned Telephone Services.

Please do not hesitate to contact me if you have any questions or concerns.

Very truly yours,

A handwritten signature in blue ink, appearing to read "John F. Cannon", is written over a horizontal line.

John F. Cannon
STRADLING YOCCA CARLSON & RAUTH, P.C.

JFC:ccc

cc: Via E-Mail and Federal Express
David Rolka (Rolka Loube)